

## Regulatory Bulletin

## RB 37-32

Handbook: Examination Handbook

Subject: Administration



Section: 060

## Examination Scheduling, Scoping, and Management

*Summary:* This Regulatory Bulletin transmits revised Examination Handbook Section 060, Examination Scheduling, Scoping, and Management, and rescinds RB 37-3, dated November 30, 2004.

*For Further Information Contact:* Your OTS Regional Office or the Examination Programs Division of the OTS, Washington, DC. You may access this bulletin and handbook section at our website: [www.ots.treas.gov](http://www.ots.treas.gov).

### Regulatory Bulletin 37-32

#### SUMMARY OF CHANGES

OTS is issuing Examination Handbook Section 060, Examination Scheduling, Scoping, and Management. Change bars in the margins of the handbook section indicate revisions. We provide a summary of substantive changes below.

#### 060 Examination Scheduling, Scoping, and Management

We revised the introduction to reflect the current approach for comprehensive examinations.

**18-Month Cycle:** Revises the 18-month examination interval to apply to savings associations with total assets of less than \$500 million pursuant to regulatory changes.

**Off-site Examination Procedures:** Emphasizes OTS strategy that off-site examination procedures should maximize the efficient and effective use of agency resources and, at the same time, minimize the burden on both the thrift industry and examination staff. Deletes discussion of the PERK since it addresses instructions for transferring and handling paper copies.

**Continuing Examination and General Administrative Documents:** Revises former Continuing Examination File and General File guidance for applicability to electronic work papers.

**Examination Conclusion:** Specifically communicates OTS policy requiring documentation of supervisory follow-up to ensure corrective actions for examination finds and matters requiring board attention.

**OTS/ FDIC Joint Examination Process:** Pared down this longstanding guidance from the 1992 agreement with the FDIC. More recent guidance supersedes certain areas, such as dedicated examiner programs and the shared national credit program.

**Eligibility Examinations:** Adds new section, however, this is existing OTS practice.

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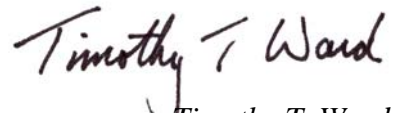
**References:** Revises the references for the recent issuance of TB 68b and Examination Handbook Section 080.

**Program:** Revises the program for applicability to the PERK PAC system and electronic work papers.

**Appendix A:** Adds Examination Handbook Section 1356, Military Service Member Protections.

**Appendix B:** Revises handbook sections headings where applicable.

**Appendix C:** Clarifies suggested time frames and various administrative examination management procedures.



*Timothy T. Ward*

***Deputy Director***

***Examinations, Supervision and Consumer Protection***

## Examination Scheduling, Scoping, and Management

The Office of Thrift Supervision (OTS) conducts comprehensive examinations to thoroughly assess each saving association's risk profile and produces one report of examination addressing safety and soundness (S&S) and compliance. New to the comprehensive examination process is the PERK PAC, which makes available S&S and Compliance information schedules in addition to other specialty areas.

### LINKS

[Program](#)[Appendix A](#)[Appendix B](#)[Appendix C](#)

Key considerations in a comprehensive examination:

- To consider findings related to Capital, Asset Quality, Earnings, Liquidity, Sensitivity (CAMELS) and Compliance in the Management evaluation and component rating. Assess the overall adequacy and effectiveness of risk management and compliance management functions of the association.
- If the EIC determines that a transactional level review of a certain activity is necessary from both a safety and soundness and compliance review standpoint, then the EIC should ensure that one examiner conducts the review efficiently and without redundancy. For instance, when reviewing single-family loan files for the asset quality review, the same examiner can check compliance information such as flood and RESPA, based on examination needs and identified risks.

This Handbook Section addresses examination strategy and objectives, examination scheduling on 12- and 18-month cycles, scoping and planning, and examination management. This section also provides guidance for intervening state, Limited, Eligibility, and Joint OTS/FDIC examinations.

### EXAMINATION STRATEGY AND OBJECTIVES

**Timely, efficient, and risk-focused** examinations are essential to an effective regulatory oversight function.

**Timely** examinations ensure that the agency stays abreast of changes in the condition or management of an association. OTS must schedule a full scope, on-site examination of each insured depository institution within the appropriate timeframe for that

*Timely, efficient, and risk-focused* examinations are essential to an effective regulatory oversight function.

institution. An efficient examination eliminates multiple reviews of the same area for different purposes by combining safety and soundness and compliance reviews of the same areas such as lending or deposits.

OTS bases the timing of an on-site examination partly on the risk profile of the association, and partly on the scope of examination for any given association. All examinations should be ***risk-focused***, meaning that you spend more time looking at higher risk areas within an organization and less time looking at low risk areas. A risk assessment considers the nature of an association's operations, the quality of management and staff, and the adequacy of management and the board's ability to identify, manage and monitor risk, and take timely action to remedy identified problems.

Risk-focused examinations assist the agency in ensuring ***efficient*** use of its resources and ensures that examiners spend the most time looking at areas or activities that pose the most risk. We also achieve efficiency in the examination process through a well-managed examination. Staffing should be appropriate to the size of the association and the scope of the review. In addition, the EIC achieves economies of scale whenever possible to eliminate any redundancies in the review process. In those associations with effective compliance management functions and a lower risk loan portfolio, transactional level review may be minimal and thus limit the opportunities for combining transaction review processes. However, the EIC should be mindful of situations where examiners can combine safety and soundness and compliance reviews.

The goal of the comprehensive examination process is to conduct a single examination where the exam team reviews the compliance and the CAMELS component areas. Based upon the findings in each of these areas, the examination team should be able to make an overall assessment of the association in terms of the risk management and compliance management functions, as well as the adequacy of management and staff.

## SCHEDULING EXAMINATIONS

OTS must conduct a full-scope, on-site examination of every savings association once during each 12-month period. OTS may conduct a full-scope, on-site examination of a savings association once during each 18-month period if the association meets the conditions below. You may conduct a limited examination under certain conditions. (See the discussion of Comprehensive Limited Examinations at the end of this Handbook Section.)

A full-scope examination, according to the statute, means that you conduct an on-site examination and rate all CAMELS components. You may conduct certain examination procedures offsite. (See the discussion of Off-Site Examination Procedures later in this section.) For comprehensive examination purposes, OTS also conducts a compliance review as part of a full-scope examination except as noted below under Intervening State Examinations.

OTS measures the 12-month and 18-month cycles from the "close date" of the last examination to the "start date" of the next examination. The "close date" is the date OTS transmits the Report of Examination (ROE) to the association.

### 12-month Cycle

By conducting examinations annually, you increase the chances of discovering problems and resolving them early. Regional offices may conduct full-scope, on-site examinations more often than prescribed by statute.

All de novo savings associations are subject to the 12-month examination cycle. The 12-month examination cycle should continue until management demonstrates its ability to operate an association in a safe and sound manner and satisfies all conditions imposed at the time of approval.

### 18-month Cycle

An 18-month examination cycle applies to insured savings associations with total assets of less than \$500 million that meet the following criteria in 12 CFR § 563.171:

- The most recent examination received a composite CAMELS rating of 1 or 2 and a Compliance rating of 1 or 2.
- The most recent examination received a Management component rating of 1 or 2.
- The association is well-capitalized as defined under Section 38 of the Federal Deposit Insurance Act (FDIA) and 12 CFR § 565.4.
- The association is not currently subject to a formal enforcement proceeding or order by the OTS or the FDIC.
- The association has not undergone a change in control during the 12-month period since completion of the last full-scope, on-site examination.

Revert to the 12-month examination cycle if any of the following triggering events occur:

- An enforcement action.
- An acquisition or change in control.
- A change in asset size to \$500 million or more.
- A downgrade in PCA rating.
- A downgrade to a 3 or worse in the CAMELS composite rating, the Compliance rating, or Management component rating.

If a triggering event occurs in any of the following time frames at an association that otherwise meets all of the criteria for an 18-month examination interval, you must conduct a full-scope examination within the appropriate interval:

<b>If the triggering event occurs....</b>	<b>Then start the next exam...</b>
Within 9 months of the “close” date of the prior full-scope exam	No later than 12 months from the close of the last full-scope exam.
Between 9 and 12 months since the close of the last full-scope exam	Within 90 days.
Twelve or more months since the close of the last full-scope exam	Within 90 days, but no later than 18 months from the close of the last full-scope exam.

Conversely, if an association under a 12-month examination interval becomes eligible for an expanded interval, the regional office may immediately expand the interval to 18 months.

## Intervening State Examinations

Regional offices may accept full-scope, on-site examinations conducted by the regulatory authorities of state-chartered depository institutions on an alternating basis instead of an OTS examination, if such examinations meet the requirements and objectives of OTS’s examination strategy. OTS has certain agreements with some States to accept an intervening state examination. OTS accepts intervening state examinations for the following savings associations:

- Composite 1- or 2-rated associations.
- Stable and improving composite 3-rated associations if off-site monitoring between examinations confirms the last composite rating and OTS does not note any adverse trends from available information.

The length of time between examinations (regardless of whether OTS or the state conducts the examination) should not exceed 12 (or 18) months based on the statutory examination cycle requirements.

Generally, States do not perform a Compliance review as part of their examinations. OTS will conduct a separate Compliance review concurrently with intervening state examinations unless all of the following conditions exist:

- The previous Compliance rating was 1 or 2.
- Off-site monitoring shows no material change in the association’s risk profile.
- The association corrected any previous compliance deficiencies.

## EXAMINATION SCOPING AND PLANNING

### Scoping an Examination

Scoping is an integral part of a risk-focused examination process, assisting examiners in targeting higher risk areas for review and in determining the appropriate examination procedures for that review. Scoping is the examination planning process that matches the risk profile of an association with the examination programs to enable a focused evaluation of association performance and appropriate rating assignments and conclusions. Scoping is the starting point of any examination and usually begins offsite.

Scoping is an integral part of a risk-focused examination process, assisting examiners in targeting higher risk areas for review and in determining the appropriate examination procedures for that review.

In brief, scoping enables you to understand the present risk profile of an association based on the following:

- A review and analysis of prior examination reports and prior track record of management.
- A review of agency monitoring records and PERK materials.
- Interviews with management.
- An assessment about changes in business operations, staffing, or external circumstances.

Based on this risk profile, the EIC can then determine the appropriate areas for examiner review, the depth of review required, the examination procedures to use, and the examination personnel requirements. The EIC may modify an examination scope based on findings during the course of an examination.

Scoping consists of three stages:

- Reviewing pre-examination information.
- Conducting management interviews.
- Developing a risk assessment.

It is critical to the risk-focused examination process that you conduct these stages using the most effective off-site and on-site methods that regional resources permit.

#### *Review Pre-examination Information*

Generally, the EIC begins the scoping process offsite, before the start of the examination, leveraging off work performed by regional staff responsible for monitoring and updating the Electronic

Continuing Examination Folder (ECEF) and Regulatory Profiles, prior exams and work papers, and relevant Preliminary Examination Response Kit (PERK) materials.

A sample of items that you might review offsite include the following:

## Agency Information

- The ECEF, (including Quarterly Monitoring Reports (QMRs)), and, if applicable, the Regulatory Profile for the association.
- Results of regional off-site monitoring.
- OTS financial reports including the Thrift Financial Report (TFR) and the Uniform Thrift Performance Report (UTPR).
- Prior savings association, compliance, and holding company work papers, and recommendations.
- Issues from preceding examinations.
- Correspondence covering significant matters involving the association that transpired between exams.
- Other correspondence and internal memoranda involving the association.
- Application information – conditions of approval and major applications filed.
- Documentation on supervisory and enforcement actions.
- Consumer complaints filed with OTS since the last examination.
- Suspicious Activity Reports and Currency Transaction Reports.
- CRA Wiz/ HMDA data.

## PERK Information

- PERK documents completed by association management before the start of the examination for information related to the following:
  - Changes in operations.
  - Changes in technology risk, systems and controls.



- Board meetings.
- Internal and external audits.
- Compliance self-assessments.
- Responses and corrective actions to exams and audits.
- Significant changes in outsourcing or vendor relationships.

#### General Data

- Economic information about the association's market area(s).
- News articles, including Internet sources.

When you arrive onsite for the examination, review additional information that may affect the scope as soon as possible. Examples of scoping materials commonly reviewed onsite include the following:

- Relevant PERK documents not available before the examination begins.
- Board reports, board minutes, and management reports.
- Compliance reviews and/or compliance self-assessments.
- Internal audit reports.
- Internal Asset Review reports.
- Business plan.
- Operating budget.
- Any new contracts (for example: employment, information systems, leases, etc.).
- Any new or revised policies and procedures.
- Any new product or delivery channel specifications and associated marketing plans.

#### *Conduct Management Interviews*

In this stage of the scoping process, the EIC should conduct detailed interviews with the President/CEO, senior management, compliance officer, internal auditor, information security officer, general counsel, or other responsible staff, as applicable. You may conduct some of the initial

discussions offsite. Further discussions will take place onsite at the start of the examination and continue (as needed) throughout the duration of the examination.

Use the interview process to confirm, modify, or supplement your preliminary judgment about the association's risk profile, changes in risk profile, management's response to those changes, and management's track record. As the EIC, you should communicate the results of the interviews to the examination team. Discussions should cover the operational impact of the following:

- Business strategic development and implementation.
- Modifications of organizational structure and lines of responsibility.
- Scope and effectiveness of employee training programs.
- Variations in financial condition or risk profile, and operating performance in comparison with the budget.
- Changes in operations that could affect ongoing safety and soundness and compliance performance.
- Actions taken to correct deficiencies identified in previous examinations, audits or compliance self-assessments.
- Management's perspective on economic conditions directly or indirectly affecting the association's financial performance and risk profile.
- Management's formal written compliance policy and self-assessment.
- Alteration of existing or development of new products.
- Significant internal or external audit findings and management's response to those findings.
- Management's adherence to, or departure from, formally established procedures or standard practices.
- Addition or removal of third-party service providers.
- Adoption, deployment, or modification of information technology platforms or tools.

You should adapt the interview process to address the particular circumstances at each association in response to findings from the pre-examination analysis. (Consult the Basic Matrix in [Appendix A](#) as an aid in identifying the regulatory obligations associated with particular products.) This process will assist you in refining the examination scope and in determining to what extent you examine certain operations, and particular laws and regulations.

### *Risk Assessment*

Proper scoping (through document reviews, data analysis and management interviews) allows the EIC to formulate initial conclusions about the savings association's condition and risk profile, including credit risk, operational risk, interest rate risk, compliance risk, strategic risk, and reputation risk.

Using pre-examination information and management interviews allows the EIC to formulate an initial assessment of:

- Current financial condition.
- Management and the board's prior track record.
- Material changes in risk profile or operating strategy, and management's response to those changes.
- The association's internal controls, including technology risk controls, risk management, and compliance management systems.
- Responsiveness of management and the board in implementing corrective action to risk management and compliance management deficiencies since the previous examination, audits or reviews.
- Association's efforts to stay abreast of and train the board, management, and staff on safety and soundness and regulatory compliance developments.

Your assessment of these areas is a critical step for determining examination scope and the risk profile.

### Selecting Examination Programs and Procedures

Based upon the risk assessment, you will determine the appropriate examination programs and procedures to use. You should consider all programs and questionnaires within the scope of the examination, including the risk-focused examination procedures. You may use a combination of procedures when performing an examination. You should perform a more detailed review of areas with greater risk or with deteriorating performance indicators and actively pursue any concerns or red flags that you uncover during the examination process. For example, if risk factors require you to go beyond risk-focused examination procedures, you may use any examination procedures included in the Examination Handbook, or conduct any other type of review determined appropriate to assess risk. You may expand the depth of review of any given area as additional facts surface that necessitate a more comprehensive review.

Use programs and questionnaires as appropriate, but only to the extent necessary to address the scope and support the examination conclusions. Programs provide guidance necessary to support examination findings and ROE comments. Wherever possible and indicated by the risk assessment conduct simultaneous reviews for safety and soundness and consumer compliance assessments.

The EIC should use the Examination Scope Worksheet in [Appendix B](#) to indicate the examination programs to complete on an examination. In many circumstances, you will not need all or even a majority of the programs. Discuss the scope of the examination with the Field Manager (FM) or Assistant Regional Director (ARD) and document their concurrence on the worksheet. Before the start of the examination, the EIC will prepare a scoping memorandum, signed by the FM or ARD, that sets forth the risk assessment and exam programs. Retain a copy for the work papers.

For example, if your review of the policies, structure, administration, and results of the association's internal asset review program reveals that the program is sufficient and the results are accurate, you may place a greater reliance on the association's internal review. The risk that the association is not adequately reviewing and classifying its assets would be low, so more detailed examination procedures would generally not be necessary.

When using this risk-focused examination approach, use sound professional judgment to ensure that the depth of review is sufficient to accurately assess the association's condition, but is not excessive. For further information regarding the examination program and the three levels of review, refer to [Examination Handbook Section 010](#), Handbook and Program Use.

## EXAMINATION MANAGEMENT

Effective management of the examination expedites and enhances the examination process by ensuring that the examination team meets the exam objectives and does so in an efficient manner. The level and sophistication of examination management methods and procedures will vary depending on the size, nature, and activities of the association.

The EIC may elect to use an Examination Management Checklist such as that found in [Appendix C](#). The checklist provides the time frames of tasks that need to take place before, during, and after each examination.

## EIC Responsibilities

The EIC carries the primary responsibility for managing the examination. The EIC's responsibilities include:

- Examination planning, organization, and implementation: The EIC is responsible for scoping the examination, setting the examination objectives, communicating the examination objectives to the examination team, and ensuring that the exam team meets the examination objectives.
- Assignments and job monitoring: The EIC must determine the expertise necessary to perform certain aspects of the examination and make assignments accordingly. The EIC is responsible for realizing the maximum efficiency from conducting coordinated safety and soundness and compliance reviews consistent with the examination's scope. Depending on the

size of the job, the EIC may delegate certain management responsibilities to assistants for efficiency and to improve upon administrative and management skills of assistants.

- Assign priorities to examination tasks and determine optimal use of comprehensive reviews across exam programs. Maximize efficiency by assigning one assistant to conduct or coordinate interrelated S&S and compliance programs to avoid duplication of effort whenever feasible.
  - Brief the examination team members on their respective assignments, including their participation in examination segments that will involve comprehensive reviews across exam programs. Provide them with the necessary information and resources to conduct their assignments efficiently.
  - Explain the risk assessment and scoping judgment relevant to each assistant's assignment. Discuss the effect of information developed during the exam on the association risk profile, possible changes to the scope, opportunities for conducting comprehensive reviews across exam programs, and the ability to meet assignment deadlines throughout the examination. Adjust assignments as warranted by these considerations.
  - Consider completing the Examination Scope Worksheet in [Appendix B](#) when assigning tasks and budgeting examination hours. The EIC specifies the areas to review on the examination considering the scope. As needed, you may add any activities not included on the worksheet.
  - Monitor the progress of the examination to achieve examination objectives in a timely manner and to identify early adjustments to the scope, staffing, and completion date. The EIC should notify a supervisor as soon as adjustments to scope or other events may affect scheduling or the completion date. The supervisor might consider staff reassignment from other jobs, if necessary.
- Prepare Report of Examination: Incorporate program findings and conclusions, edit comments and finalize the ROE. Compile, index and file work papers. Properly record necessary exam data and regulatory violations in agency systems.
  - Serve as the primary communications link: The EIC is the focal point for communications on significant matters. Assistants, association personnel, and regional office staff must all know how to communicate information and when to share information. During the examination, it is important that only one responsible individual provide answers to significant items. The EIC should coordinate this in case questions arise.
- Examiners should communicate any significant changes to the scope and the reasons for them with examiners involved in holding company, trust and asset management, and information technology (IT) examinations. Share significant findings and conclusions to avoid duplicating efforts.

- When the FDIC or a state banking department participates in an examination, maintain close communication with FDIC regulatory authorities and appropriate state regulatory authorities. See the discussion of OTS/FDIC Joint Examinations Process later in this Handbook Section.
- Early in the examination, the EIC should discuss with the President/CEO, or with a designated association representative, some of the administrative aspects of the examination, including:
  - ♦ Time frames for receiving requested information.
  - ♦ The availability of the examiners to answer questions from the staff preparing requested information.
  - ♦ Names of key contact people.
  - ♦ Facilities and parking availability.
  - ♦ Hours for work.
  - ♦ Use of equipment.
  - ♦ The expected duration of the examination.
  - ♦ Any planned interruptions (these should be kept to a minimum).
  - ♦ Names of assisting examiners.
- The EIC should schedule regular meetings with the CEO to discuss the progress of the examination and to address any issues of concern. Conduct the examination efficiently to minimize undue disruption for the association. Convey any unresolved concerns management expresses about exam progress to a supervisor.
- The EIC should schedule an examination exit meeting with the association's senior management to discuss examination findings, the examiner's overall conclusions, and recommendations. See [Handbook Section 070](#), Ratings: Developing, Assigning, and Presenting.
- Manage staff development and evaluation of assistants: Assistants may need guidance, depending on their experience and ability. The EIC should encourage questions and ensure that someone is available to provide guidance. Depending on the size of the job, the EIC should be familiar with the work performed by the assistant(s) so that they can make fair and constructive evaluations of their work.

- Whenever possible, assign assistants to program areas that they can complete, including report pages and comments, before leaving the assignment. This allows for efficiency and accountability and provides necessary on-the-job training.
- Monitor assistants' performance throughout the examination to ensure that they are meeting objectives according to schedule and consistent with agency standards for quality work product. Early identification of work-related problems also allows the assistants the opportunity to correct mistakes and to immediately improve upon skills.
- Ensure a cooperative and positive working environment: Conduct examinations with as little disruption, conflict, and confusion as possible. A positive work environment fosters the productivity of the team members. Disagreements will occur at times, but avoid an antagonistic role. Allow for regular meetings with management to discuss findings and questions, and avoid monopolizing the time of the staff as much as possible. A professional and considerate approach usually results in cooperation from the association staff.

### Off-Site Examination Procedures

OTS may conduct certain examination procedures offsite as proficiently as they conduct them onsite. The completion of off-site examination work complements the OTS strategy that seeks to maximize the efficient and effective use of agency resources. At the same time, it should minimize the burden on both the thrift industry and the examination staff. Some of the advantages of performing procedures offsite may include reduction in travel expenses and minimal disruption to thrift operations.

Regional directors or their designee should develop appropriate policies and procedures for performing examination procedures offsite. Examiner discretion and the ability to exercise judgment will remain a critical aspect of the process whereby the risks identified within each examination assignment will drive the level of off-site work that the examination team can effectively perform.

### *Savings Association Selection Criteria*

You should determine whether to use off-site examination procedures based on certain criteria, including:

- The association's CAMELS and Compliance ratings.
- Prior history.
- Complexity of operations.
- Reliability of data.
- Capabilities of examination staff assigned.

This approach is flexible because there are no firm guidelines such as asset size, rating, or location to determine when you can or cannot use off-site examination analysis.

Open lines of communication with association personnel are essential at all examinations, but you may have to take extra steps to keep those lines open during off-site portions of the examination. Advise association management of the start and completion of off-site work.

### *Examination Data System/ Report of Examination*

The Examination Data System/Report of Examination (EDS/ROE) should continue to reflect the actual start and completion dates of examination work performed onsite. These dates should correspond with the dates disclosed in the cover page of the examination report.

## Continuing Examination and General Administrative Documents

Retention of the following documents preserves examination continuity and reduces excessive requests for information during examinations.

### *Continuing Examination Documents*

Retain the following documents with the electronic work papers:

- Copy of Charter and Bylaws
- Copy of Conditions for Insurance (in force)
- Summary of Leases
- Proxy Statement, if applicable
- Schedule of Branch Offices and LPOs

File in ECEF:

- Enforcement Documents
- Recent Correspondence
- News articles

Retain the following documents with the electronic PERK files or applicable examination work papers:

- Management and Director Committees and Members (PERK01)
- Organizational Chart (PERK01)



- Officer Resumes (PERK01)
- Directors' and Officers' Home Addresses (PERK03)
- Holding Company/Affiliates Corporate Structure (PERK21)
- Internal Audit Program (PERK01)
- Stockholders' Schedule (PERK08)
- Approved Appraisers and Qualifications (PERK01)
- Copies of new or significant Policies

### General Administrative Documents

File examination-related administrative information in the Administration folder of the electronic work papers. This might include any of the following items:

- Examination Scope Worksheet ([Appendix B](#))
- Examination Management Checklist ([Appendix C](#))
- Examination Scheduling, Scoping, and Management [Program](#)
- Pre-Assignment Analysis
- Exception Sheets
- Ratings: Developing, Assigning, and Presenting Program

You should use exception sheets to record all specific regulatory and policy violations that you do not specifically discuss in the ROE. Either the managing officer or the appropriate department head must provide a disposition for each problem noted and initial the exception sheet. Provide a copy of all exception sheets to the managing officer.

### Examination Conclusion

The EIC is responsible for reviewing and compiling the examination findings, identifying matters that require Board attention or savings association action, and ensuring the Examination Conclusions and Comments page presents a concise and balanced portrayal of an association's condition and future prospects. The ratings should reflect the overall examination findings and conclusions.

Responsible OTS regional staff should update the ECEF and, if applicable, create or update the Regulatory Profile. In addition, regional staff should:

- Enter matters requiring board attention or savings association action in the Examination Follow-Up System.
- Ensure that the association takes timely and appropriate corrective action for any problems found during the examination.
- Closely monitor (during and outside of the examination process) compliance with matters requiring Board attention and other required corrective actions.
- Promptly identify and appropriately address any significant noncompliance or recurrence of identified problems.

OTS regional staff must send the report of examination to 1- and 2-rated savings associations within 30 days from completion of on-site examination activities; and to 3-, 4-, and 5-rated associations within 45 days from completion of on-site examination activities.

Refer to Examination [Handbook Section 070](#), Ratings: Developing, Assigning, and Presenting, for other appropriate examination closing procedures.

## OTS/FDIC JOINT EXAMINATION PROCESS

Pursuant to the Information Sharing and Special Examination Agreement with the FDIC, OTS and FDIC regional staffs will meet regularly to review the examination schedule. The FDIC should indicate those examinations in which they desire joint participation. FDIC will perform all savings association examination activities on a joint basis unless compelling reasons dictate otherwise.

For joint examinations, the FDIC and OTS will jointly scope the examination at the EIC level or at the respective regional office level. Disagreements over scope should default to the broader alternative. When examinations of savings association affiliates are necessary, the EIC should decide how to conduct the examinations.

OTS will provide the FDIC with a copy of the ROE through an automated process when transmitting the ROE to the association.

OTS is responsible for specialty examinations such as Trust and Asset Management and Information Technology.

Nothing in the joint OTS/FDIC agreement alters the normal examination and supervisory cooperation with state authorities.

## Special Examinations and Information Sharing

A key principle of the information sharing agreement is that the federal banking agencies are committed to providing the FDIC information on and access to insured depository institutions that represent a heightened risk to the insurance fund.

OTS presumes that the following associations represent a “heightened risk” to the insurance fund:

- Insured depository institutions with a composite rating of 3, 4, or 5.
- Insured depository institutions that are undercapitalized as defined under Prompt Corrective Action.

In other cases, FDIC may request participation in examinations or meetings when an institution exhibits material deteriorating conditions or other adverse developments that could result in the institution becoming troubled in the near term. In limited instances, the FDIC will need to develop contingency plans for an institution’s possible failure or the commencement of the resolution process. FDIC’s Division of Resolution and Receiverships will work with the primary federal regulator to collect contingency planning information on the following institutions:

- Institutions with composite ratings of 4 that would pose unique or exceptional risks in the event of failure.
- Institutions with existing or anticipated composite ratings of 5.
- Institutions significantly or critically undercapitalized as defined under Prompt Corrective Action.
- Institutions otherwise identified as having adverse developments that could result in the institutions becoming troubled in the near term.

The FDIC will collect the information in the most efficient and least disruptive manner, relying on examiners, work papers, examination reports, and other supervisory information as sources for preliminary contingency planning information. If additional information is needed, FDIC staff will meet and coordinate with OTS prior to conducting any on-site information collection and will, to the extent possible, conduct on-site activities concurrently with the primary regulator’s scheduled examinations. FDIC or the primary regulator will notify the appropriate institution contact of FDIC’s scheduled on-site presence and purpose. The amount and type of information collected will depend on the nature and severity of an institution’s problems or risk profile in the event of failure.

## Report of Examination

Joint examinations represent a division of responsibilities among the joint staff; the OTS and FDIC each provide an EIC, who share responsibility for managing the examination and are responsible for resolving interagency differences during the examination process. EICs of both agencies will coordinate

and communicate during the examination to ensure that they achieve examination objectives with a minimum of redundancy.

The FDIC's ROE will be for internal purposes only, although they provide a copy to the OTS regional office. If the FDIC Board authorizes an enforcement action, however, the FDIC would then transmit its examination report to the institution. As the OTS and FDIC regional staffs prepare the concurrent reports, they should attempt to resolve all significant differences of opinion concerning the thrift's overall condition and the enforcement or corrective action needed.

## COMPREHENSIVE LIMITED EXAMINATIONS

You may conduct a comprehensive limited examination for the following associations:

- De novo or newly insured saving associations.
- Associations that have had a change in management, control, or operations.
- Associations under an enforcement agreement.
- Associations whose conditions undergo a significant change.

Use the comprehensive limited examination for reviews focusing on high-risk areas. Limited examinations do not satisfy the 12/18-month requirement.

You may conduct a comprehensive limited examination onsite or offsite. To determine if an association needs an on-site, limited examination focus on the following factors:

- Changes in business activity and strategy, such as a change in loan product lines, the investment portfolio, or the deposit structure.
- Action taken by management to correct items of concern noted at the most recent examination.
- Deterioration in asset quality indicators such as nonperforming assets.
- Circumstances indicating a deteriorating and deficient Compliance management program.
- Noncompliance with prior enforcement actions.
- Negative earnings, unfavorable earnings trends, or dependence on nonoperating income.
- The levels and composition of capital, as well as trends in capital formation and accumulation.
- An excessive rate of growth or a level of growth that exceeds capital levels or regulatory or supervisory directives.

- Changes in other key financial ratios and indicators.
- Other information such as the external audit report, news articles, supervisory correspondence, consumer complaints alleging discrimination, and information obtained from examinations of other savings associations.

You may also use the comprehensive limited examination to ensure the association's compliance with certain conditions. Depending on the circumstances of the limited examination, you may use specific ROE pages or a memo-style format to report your findings.

## ELIGIBILITY EXAMINATIONS

An eligibility examination is the collection and analysis of critical information in conjunction with an application for a new thrift charter, charter conversion, or change of control. The examination supplements the customary review and analysis of the application and provides additional information for OTS decision-makers. Therefore, the examination scope should focus on novel or significant issues or risks that have a material impact on the success of the proposed activity or strategy. Examination procedures may include on- or off-site activities. Examiners will document results in a memorandum-style ROE.

OTS will perform an eligibility examination in cases where the application involves an existing company or line of business that is to be converted to, to be combined with, or will otherwise materially alter or affect the operations of a savings association. Converting entities that have been recently examined by a federal or state banking or trust regulator, and received satisfactory ratings (CAMELS 1 or 2, Trust 1 or 2, Compliance 1 or 2, and CRA Satisfactory or Outstanding) may not require an eligibility examination, unless the application raises a material issue not addressed by the existing ROE. These are the typical circumstances that warrant an eligibility exam, but the Regional office may identify other occasions that necessitate an eligibility exam.

The Regional office should determine the need for an eligibility examination as early in the application process as possible and promptly inform the applicant if it will be conducting an examination. Typically, the Regional office will make the determination and notify the applicant in the pre-filing meeting. The Regional office must schedule and perform the examination promptly and prior to an application being deemed complete so that the examination does not delay the application review process.

## Planning and Scoping an Eligibility Examination

Planning and scoping eligibility examinations entails:

- Determining the work to perform.
- Arranging for qualified examiner resources.

- Coordinating with other applicable agencies.

When the Regional office establishes an exam date, promptly inform the applicant of the timing and objectives of the exam. When applicable, the OTS may conduct an eligibility examination jointly with an insurance-of-accounts examination performed by the FDIC, pursuant to a joint OTS/FDIC Examination Agreement.

The Regional office's scope-setting process must incorporate input from Regional applications staff, in addition to supervisory and examination staff. The applications staff should coordinate with other parties involved in the applications review process, including DC supervisory and legal staff, to ensure that supervision and examiners are aware of all pertinent issues and information needs. Generally, the applications staff input should be in the form of a brief, written summary of issues. As part of the scoping process, the EIC should also obtain and review, as applicable:

- The application itself, including the applicant's current business plan.
- Subsequent responses by the applicant to requests for additional information or any subsequent related filings (along with the related requests).
- Any information or comments provided by application processing staff.
- The applicant's two most recent examination reports (and work papers, if necessary) from other regulatory agencies (i.e., OCC, FDIC, FRB, NCUA, NASD, or state).

During the examination, supervision and examiners must communicate with regional applications staff to ensure that the exam scope addresses all material issues as they evolve.

## Examination Procedures

You should tailor each eligibility examination to the particular risks posed by the applicant's business plan. The examination scope should dictate the examination procedures, that is, perform procedures necessary to assess significant or novel issues that are relevant to the application decision. When appropriate, you may reduce or modify procedures based upon the findings and conclusions of prior regulatory examination reports. An eligibility examination should address the following general disciplines, as applicable.

### *Safety and Soundness*

You should generally select appropriate Level I examination procedures from the Examination Handbook to address the risks posed by the applicant and the circumstances. You should use judgment in reviewing specific risks unique to specialty businesses such as credit card operations or insurance companies.

*Compliance/CRA*

The Regional office should consider a compliance component in the eligibility examination, performed by a qualified compliance examiner. As with safety and soundness, limit compliance review procedures to the minimum necessary to identify critical compliance management risks. You may also review CRA performance as necessary to gather information to supplement CRA plans and representations provided in the application.

*Information Technology*

Depending on the applicant's size and complexity, the Regional office may determine that a review of the applicant's information technology (IT) is necessary. Specific issues that may require review include the following:

- Transactional web site processing and electronic banking.
- Complex local and wide area networks.
- Use of emerging or untested technology.
- Systems conversions or other major upcoming systems projects.
- Poor past performance in IT areas.

An experienced IT examiner should perform the review of this area.

*Trust Operations*

When the applicant proposes significant trust activities, a qualified trust examiner should participate in the eligibility examination to assess critical trust management and control functions. The trust examiner should generally perform selected Level I examination procedures from the Trust and Asset Management Handbook as appropriate to address the risks posed by the applicant and the circumstances. Generally, trust will only require review when trust operations are expected to form a substantial portion of the applicant's business. When trust operations are the only substantial activity of the applicant, it may not be necessary to include other examination segments.

**ROE**

Prepare a memorandum style ROE summarizing the examination scope and procedures, any novel or critical issues, management's response, and the significant findings for each area reviewed including CAMELS, compliance, CRA, IT, and trust, as applicable. The memorandum should clearly state the overall conclusions of the examination and issues that application processing staff and other OTS decision-makers should consider in their evaluation of the application.

## REFERENCES

Code of Federal Regulations (12 CFR)

§ 563.171              Frequency of Examinations

Office of Thrift Supervision Bulletins

TB 68b              Appeals and Ombudsman Matters

Closely Related Handbook Sections

[Section 010](#)              Handbook and Program Use

[Section 040](#)              Examination Systems

[Section 070](#)              Ratings: Developing, Assigning, and Presenting

[Section 080](#)              Enforcement Actions

OTS Report of Examination Instructions

Interagency Agreements

FFIEC Guidelines for Relying on State Examinations (June 27, 1995)

Information Sharing and Special Examination Agreement with the FDIC (January 25, 2002)



# Examination Scheduling, Scoping, and Management Program

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## EXAMINATION OBJECTIVES

To ensure that OTS conducts a full-scope, on-site examination according to scheduling requirements:

- Analyze agency records and Preliminary Examination Response Kit (PERK) materials, and conduct interviews with management.
- Develop a risk profile.
- Select examination procedures appropriate to the risks identified.
- Modify the scope and level of review as appropriate based on examination findings.

To ensure that the examination makes efficient use of resources:

- Combine areas of review where appropriate.
- Ensure the appropriate staffing and levels of expertise.
- Conduct off-site work where appropriate.
- Dedicate more resources to higher-risk areas and fewer resources to areas of less risk.
- Supplement formal education programs through on-the-job training.

To ensure that the examination is well-managed:

- Timely receipt of information.
- Open and timely communication with association management, agency staff, and other regulatory staff.
- The examination proceeds as scheduled or the schedule is revised based on adverse examination findings.
- Appropriate examiner conduct.
- Timely identification of material issues.

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# Examination Scheduling, Scoping, and Management Program

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- Appropriate documentation of work.

To provide useful information for future planning, scoping, monitoring, and management.

## SCHEDULING

The regional office will determine the examination schedule on a 12- or 18-month cycle according to the criteria outlined in this Handbook Section.

## SCOPING PROCEDURES

WKP. REF.

Generally, you should follow the procedures below, however, you must modify these procedures based on the size and complexity of the savings association. For example, for smaller, well-rated associations with strong management and no changes in business operations, it may not be necessary to conduct an extensive review of records and interviews to determine the appropriate examination scope.

1. Prior to the examination, review the Electronic Continuing Examination Folder (ECEP) and, if applicable, the Regulatory Profile for the savings association.  

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2. Ensure the PERK is tailored to the savings association and type of examination. Send the PERK to the association at least four weeks prior to the examination start date.  

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3. Review the most recent scoping materials available (those available in advance of the examination) and any relevant PERK materials received prior to the examination. This Handbook Section provides a list of scoping and PERK materials.  

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4. If applicable, coordinate with the OTS specialty (information technology, etc.) EIC, and the FDIC EIC or FDIC regional office for joint scoping.  

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# Examination Scheduling, Scoping, and Management Program

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WKP. REF.

5. Conduct management and compliance interviews. See this Handbook Section for interview discussion topics. Conduct interviews with management by phone, if possible.
- 

6. Formulate a risk assessment based on the following:

- The association's current financial condition.
  - Management and the BOD's prior track record in managing risk and taking corrective action.
  - Material changes in risk profile or operating strategy and management's response to those changes.
  - Quality of internal controls, technology controls, risk management, and compliance management systems.
- 

7. Establish and document the detailed scope for the examination in a scoping memo. Your field manager should review and sign the memo. Retain a copy in the work papers.
- 

*Note: For branch reviews, evaluate internal controls, management reporting, and audit coverage and findings before establishing scope. It may be necessary to perform only limited reviews of branches, particularly if the association can send credit files and other information to the office where the examiners are working.*

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8. Finalize staffing and examination dates. Contact assistants and inquire whether they have scheduled any time off or will be attending any training seminars during the examination.
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# Examination Scheduling, Scoping, and Management Program

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WKP. REF.

9. Prepare assignments for assistants (before commencing the examination, if possible) based on the scope and areas of expertise. Assign examiners S&S and consumer compliance review in areas where there is overlap, such as lending and deposit areas. You should prepare an Examination Scope Worksheet (see [Appendix B](#)) and budget exam hours accordingly.

- 
10. Coordinate and oversee the review of association materials that might give an early indication of a need to change the scope (refer to this Handbook Section for a list of these materials). This review should include the following procedures:

- Review the association's current Thrift Financial Reports (TFR) and Management Information Systems (MIS) reports and determine if there have been significant changes in the level of capital, lending or investment activity, earnings, or nonperforming assets.
- Review the minutes of the board of directors' meetings. Focus attention on significant changes in the association's business activities (lending, investment, joint ventures, etc.). Assess the level of oversight performed by the directorate.
- Discuss with management any changes in key management, the directorate, or business activities that have occurred since the preceding examination. Also inquire as to any proposed changes or pending litigation that may affect earnings and capital.
- Determine through a review of correspondence, discussions with management, and other appropriate verification methods, if management corrected any problems related to the following areas:
  - Prior examination report comments and supervisory letters.
  - External auditor's exceptions.
  - Internal auditor's exceptions.
  - Any enforcement actions and directives.
- Determine if there are written policies governing key areas such as lending and investments. Evaluate the adequacy of new or revised written policies, procedures, and strategic plans. These guidelines should adequately address

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# Examination Scheduling, Scoping, and Management Program

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WKP. REF.

safety and soundness (including internal controls), profitability, and compliance with laws and regulations.

- 
11. Make adjustments to the examination scope as necessary, but preferably as early as possible. Notify a supervisor if you anticipate significant changes in scope, staffing needs, duration, etc. Revise the risk assessment, as appropriate.
  12. Select exam procedures appropriate to the risk profile of the association.
- 

## EXAMINATION MANAGEMENT PROCEDURES

The EIC should perform the following procedures as soon as possible to ensure that the examination is properly managed.

1. Meet with the CEO or designee as soon as possible at the beginning of the examination. Refer to this Handbook Section for a list of recommended items to discuss. Discuss the administrative aspects of the examination. Notify the appropriate office when the examination begins.
2. Discuss scope and assignments with assistants including estimated time for completion. Determine that assistants are aware of the specific activities included in the exam scope. Assist in establishing the scope for each of the assigned programs.
3. As necessary, review with the examiners assigned lending and deposits the specific areas requiring review for interrelated S&S and compliance issues.

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# Examination Scheduling, Scoping, and Management Program

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WKP. REF.

4. If applicable, coordinate with the FDIC dedicated examiner to observe and participate in particular exam activities, and in the review and assessment of the risk of credits in the Shared National Credit Program.

- 
5. Ensure the timely receipt and dissemination of PERK materials requested from management. Discuss problems with the appropriate contact person and establish revised deadlines for receipt of materials, if necessary.

- 
6. Throughout the examination:

- Review on a regular basis the workflow, findings, and actual versus budgeted time.
- Take appropriate steps to include on-the-job training. Consider your assistants' task records, if applicable.
- Discuss all items of concern with the assistants to ensure that the OTS presents accurate information at the closing conference with the CEO.
- Keep the supervisor and the CEO abreast of any developing significant issues.
- Ensure that your assistants are preparing examination work in accordance with policies, including: work papers, interim reports, exception sheets, draft comments, report pages, time sheets, and administrative reports. Refer to [Examination Handbook Section 070](#), Ratings: Developing, Assigning, and Presenting, for a discussion of report content.

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7. If you need additional verification, review, or analysis of any areas, complete or assign the completion of selected procedures from Levels I, II, and III for the particular area of review. (Refer to instructions for selecting Levels I, II, and III procedures in Examination [Handbook Section 010](#), Handbook and Program Use.)
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# Examination Scheduling, Scoping, and Management Program

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WKP. REF.

8. Ensure that the examination meets the Examination Objectives of this Handbook Section.
- 

## EXAMINATION CLOSING PROCEDURES

1. Schedule a closing conference and incorporate comments in the report. (For further instructions see Examination [Handbook Section 070](#), Ratings: Developing, Assigning, and Presenting.) Notify all attendees of the closing conference date and time, and prepare an agenda.
  2. If appropriate, recommend any necessary administrative actions. Prepare a confidential memorandum if necessary.
  3. If deemed constructive, provide a copy of [Thrift Bulletin \(TB\) 68b](#) to the CEO and discuss the process for resolving differences with examiners, including the TB 68b appeal process.
  4. Complete the EDS/ROE. You should verify all totals in the examination report and other reports with a calculator or with the use of spreadsheet software. Refer to Examination [Handbook Sections 040](#), Examination Systems, and [070](#), Ratings: Developing, Assigning, and Presenting; and the ROE Instructions.
  5. Ensure the completion and upload of the General Administrative documents to the electronic work papers.
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# Examination Scheduling, Scoping, and Management Program

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WKP. REF.

6. The EIC should conduct a final review of the work paper content and conclusions before finalization of the conclusions and comments.  

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7. Prepare, if appropriate, evaluations of assistants. Sign off on their task records. Recommend formal instruction and on-the-job experience that would further each of their careers. Discuss the evaluation with the individual and their supervisor, if applicable.  

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8. Initiate the PERK PAC for the next examination. Summarize any other information useful to the planning, scoping, and control of future examination activities and include the information in ECEF. Compare actual and budgeted exam hours.  

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9. If applicable, create or update the Regulatory Profile with any significant data obtained from the examination. See [Examination Handbook Section 040](#), Examination Systems.  

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10. Transmit the completed report and return any hard copy documents and files to the regional office in accordance with established procedures. Finalize electronic work papers.  

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## EXAMINER'S SUMMARY, RECOMMENDATIONS, AND COMMENTS

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# Appendix A: Examination Scheduling, Scoping, and Management

Section 060

## BASIC SCOPING MATRIX

Institution: Docket: Field Manager: EIC:  <b>Compliance Areas</b>	<b>Product Lines</b>										
	Savings Accounts	Transaction Accounts	Mortgage Loans (Including Construction)	Consumer Non-Mortgage Loans	Commercial Non-Mortgage Loans	Finance Leasing	Monetary Instrument Sales	Payment Systems Risk	Insurance Sales	Securities Sales	Branch Security & Notices
Equal Credit Opportunity – EH 1205			X	X	X	X					X
Fair Housing – EH 1210			X								X
Home Mortgage Disclosure – EH 1215			X								X
Fair Credit Reporting – EH 1300	X	X	X	X	X				X		
Truth-in-Lending – EH 1305			X	X							
OTS Mortgage Regulations – EH 1315			X								
Real Estate Settlement Procedures – EH 1320			X								
Homeowners Protection – EH 1323			X								
Consumer Leasing – EH 1325						X					
Electronic Fund Transfer – EH 1330	X	X						X			
Expedited Funds Availability – EH 1335		X									X
Flood – EH 1340			X								
Right to Financial Privacy – EH 1345	X	X	X	X	X	X	X	X	X	X	X
Fair Debt Collection – EH 1350			X	X							
Unfair or Deceptive Acts – EH 1355			X								
Military Service Member Protections – EH 1356	X	X		X							
Homeownership Counseling – EH 1360			X								
Truth-in-Savings – EH 1365	X	X									
Electronic Banking – EH 1370	X	X	X	X	X	X	X	X	X	X	
Gramm-Leach-Bliley Privacy – EH 1375	X	X	X	X	X		X	X			
Insurance Consumer Protection – EH 1380				X	X	X			X		
Bank Secrecy Act and OFAC– FFIEC BSA/AML	X	X	X	X	X		X	X	X	X	
Bank Protection Act – EH 1405											X
Interest on Deposits – EH 1420	X	X									
Advertising – EH 1425	X	X	X	X	X		X	X	X	X	X

# Appendix B: Examination Scheduling, Scoping, and Management

Section 060

## EXAMINATION SCOPE WORKSHEET

Association: \_\_\_\_\_ Docket No.: \_\_\_\_\_  
 Exam Type: \_\_\_\_\_ Start Date: \_\_\_\_\_  
 Review Period: \_\_\_\_\_  
 Examiner-in-Charge: \_\_\_\_\_  
 Compliance Examiner-in-Charge: \_\_\_\_\_

### Scope Summary and areas of risk:

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Examination Procedures (*Required)	Incl. In scope?			Comments	Review Next Exam?	
	Yes	No	Consider		Yes	No

### Administration

Exam Scheduling, Scoping, Management (060)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Enforcement Actions (080)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

### Capital

Risk-Focused Procedures (100RP)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Tailored Procedures (100TP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Capital Stock and Ownership (110)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Capital Adequacy (120)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

### Asset Quality

Risk-Focused Procedures (200RP)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Tailored Procedures (200TP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Overview: Lending Ops/Portfolio Risk (201)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Real Estate Appraisal (208)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Sampling (209)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Income Property Lending (210)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Loans to One Borrower (211)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
One- to Four-Family RE Lending (212)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Construction Lending (213)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Other Commercial Lending (214)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

APPENDIX B: EXAMINATION SCHEDULING, SCOPING,  
AND MANAGEMENT

SECTION 060

Examination Procedures (*Required)	Incl. In scope?			Comments	Review Next Exam?	
	Yes	No	Consider		Yes	No
Letters of Credit (215)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Floor Plan and Indirect Lending (216)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Consumer Lending (217)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Credit Card Lending (218)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Leasing Activities (219)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Equity Investments (230)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Troubled Debt Restructurings (240)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Other Assets/Liabilities (250)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Real Estate Owned and Other Reposessed Assets (251)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Fixed Assets (252)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Classification of Assets (260)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Adequacy of Valuation Allowances (261)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Qualified Thrift Lender Test (270)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Margin Securities Regulation U (280)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

**Management**

Risk-Focused Procedures (300RP)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Tailored Procedures (300TP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Oversight by the Board of Directors (310)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Management Assessment (330)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Internal Control (340)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
IT Risks and Controls (341)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
External Audit (350)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Internal Audit (355)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Fraud/Insider Abuse (360)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Transactions with Affiliates (380)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

**Earnings**

Risk-Focused Procedures (400RP)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Tailored Procedures (400TP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Financial Records and Reports (410)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Operations Analysis (430)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

**Liquidity**

Risk-Focused Procedures (500RP)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Tailored Procedures (500TP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Funds Management (510)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

APPENDIX B: EXAMINATION SCHEDULING, SCOPING,  
AND MANAGEMENT

SECTION 060

Examination Procedures (*Required)	Incl. In scope?			Comments	Review Next Exam?	
	Yes	No	Consider		Yes	No
Cash Flow and Liquidity Management (530)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Investment Securities (540)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Deposits/Borrowed Funds (560)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Reserve Requirements Reg D (561)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Government Securities Act (563)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Payment Systems Risk (580)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Sensitivity to Market Risk</b>						
Risk-Focused Procedures (600RP)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Tailored Procedures (600TP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Interest Rate Risk Management (650)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Derivative Instruments and Hedging (660)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Other Activities</b>						
Networking Arrangements (710)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Insurance (720)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Subordinate Organizations (730)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Real Estate Development (740)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Mortgage Banking (750)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Compliance Management</b>						
Tailored Procedures (1000TP)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Compliance Oversight Examination Program (1100)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Fair Lending/Nondiscrimination<sup>1</sup></b>						
Fair Lending – Potential for Discriminatory Conduct (1201)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Nondiscrimination (1200)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Fair Lending – other (1201)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Equal Credit Opportunity Act (1205)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Fair Housing Act (1210)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Home Mortgage Disclosure Act (1215)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Equal Employment Opportunity (1410)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Americans with Disabilities Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

APPENDIX B: EXAMINATION SCHEDULING, SCOPING,  
AND MANAGEMENT

SECTION 060

Examination Procedures (*Required)	Incl. In scope?			Comments	Review Next Exam?	
	Yes	No	Consider		Yes	No
<b>Privacy<sup>1</sup></b>						
Telephone Consumer Protection Act (1300)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Controlling the Assault of Non-Solicited Pornography Marketing Act (1300)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Right to Financial Privacy Act (1345)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Electronic Banking (1370)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Gramm-Leach-Bliley Act Privacy Provisions (1375)*	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Bank Secrecy Act (BSA), USA PATRIOT Act, Office of Foreign Assets Control (OFAC) Economic Sanctions<sup>1</sup></b>						
Bank Secrecy Act and OFAC – FFIEC BSA Exam Manual	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
USA Patriot Act	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Lending Laws and Regulations<sup>1</sup></b>						
Fair Credit Reporting Act (1300)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Truth in Lending Act (1305)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Truth in Lending Act Restitution (1310)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
OTS Mortgage Regulations (1315)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Real Estate Settlement Procedures Act (1320)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Homeowners Protection Act (1323)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Consumer Leasing Act (1325)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Flood Disaster Protection Act (1340)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Military Service Member Protections (1356)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Homeownership Counseling Procedures (1360)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Electronic Banking – lending aspects (1370)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Federal Housing Administration Awareness Requirements	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Miscellaneous OTS Lending Regulations (late charges, prepayment penalties, due-on-sale or transfer clauses)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Deposit Operations Laws and Regulations<sup>1</sup></b>						
Electronic Fund Transfer Act (1330)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Expedited Funds Availability Act (1335)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

APPENDIX B: EXAMINATION SCHEDULING, SCOPING,  
AND MANAGEMENT

SECTION 060

Examination Procedures (*Required)	Incl. In scope?			Comments	Review Next Exam?	
	Yes	No	Consider		Yes	No
Check 21 (1336)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Truth in Savings Act (1365)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Electronic Banking (1370)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Interest on Deposits (1420)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Deposit Insurance of Accounts	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Preventing Abusive Practices</b>						
Fair Debt Collection Practices Act (1350)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Unfair and Deceptive Acts/Practices (1355)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Consumer Protection in Sales of Insurance (1380)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
OTS Advertising Rule (1425)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
<b>Other Operational Issues</b>						
Bank Protection Act (1405)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Branch Closings (1430)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Branch Review Procedures	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>

## Appendix B: Examination Scheduling, Scoping and Management

Section 060

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### Estimated Time to Complete Exam

#### This Exam:

Estimated # of examiner weeks needed to complete exam with above scope.

(For example: 3 examiners X 4 weeks = 12 examiner weeks)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

#### Next Exam:

Estimated # of examiner weeks recommended to complete exam with above scope. (For

example: 3 examiners X 4 weeks = 12 examiner weeks)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### Other Comments

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### Scope for This Exam

Prepared by:

Date:

Approved by:

Date:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

### Scope Recommendations for Next Exam

Prepared by:

Date:

\_\_\_\_\_

\_\_\_\_\_

#### After the exam has concluded, please:

- Include this form with your exam work papers.
- Send the completed scope worksheet to the caseload FM or ARD for posting on the ECEF.

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<sup>1</sup> The required compliance review areas during each examination cycle include BSA/ OFAC Economic Sanctions/ USA PATRIOT Act, Fair Lending/ Nondiscrimination, Compliance Management, and Flood Disaster Protection Act. In addition, the required compliance review areas include any new nondiscrimination, consumer protection, or public interest requirement, for the initial exam cycle after implementation.

## EXAMINATION MANAGEMENT CHECKLIST

<b>Association:</b> _____	<b>Docket No.:</b> _____
<b>Exam Type:</b> _____	<b>Start Date:</b> _____
<b>Review Period:</b> _____	
<b>Examiner(s)-in-Charge</b>	
<b>Safety and Soundness:</b>	_____
<b>Compliance:</b>	_____
<b>Field Manager:</b>	_____
<b>Assistant Regional Director:</b>	_____

### Prior to the Examination

No later than 60 days prior to exam	Initial When Completed
Contact ARD/FM/Compliance EIC/Office Examiner/Financial Analyst/CRA Specialist to discuss the following (contact association management for an update, if warranted):	
• Developments at the association since the prior examination	
• Staffing and assignments	
• Potential need for specialists, including:	
– Credit Specialist	
– Capital Market Examiners	
– Appraiser	
– Accountant	
– Information Technology specialist	
• Items to be reviewed /prepared prior to final customization of the PERK	
• Travel issues	
• Telecommuting options	
• Involvement of other agencies, if applicable	
• Application Condition Monitoring Report, if applicable	
Date of Meeting/Discussion:	



## Appendix C: Examination Scheduling, Scoping, and Management

## Section 060

<b>45 to 60 days prior to exam</b>	<b>Initial When Completed</b>
Review information to customize exam scope and the PERK PAC	
<ul style="list-style-type: none"> <li>• Prior ROEs/Work papers/Board Responses/EDS III</li> </ul>	
<ul style="list-style-type: none"> <li>• ECEF (TFR/UTPR/Association Profile/Enforcement Actions/Application History/etc.)</li> </ul>	
<ul style="list-style-type: none"> <li>• OTS Correspondence Files</li> </ul>	
<ul style="list-style-type: none"> <li>• Business Plans/Board of Directors Minutes/Audits/Any other information sent to OTS during review period</li> </ul>	
<ul style="list-style-type: none"> <li>• FDIC Website (Branches/Market Share/Financial Analysis)</li> </ul>	
<ul style="list-style-type: none"> <li>• Consumer Complaint Records/Reports</li> </ul>	
<ul style="list-style-type: none"> <li>• Information regarding litigation</li> </ul>	
<ul style="list-style-type: none"> <li>• CRA Wiz Reports</li> </ul>	
<ul style="list-style-type: none"> <li>• IRS/FinCEN Reports (SARs, CTRs, etc.)</li> </ul>	
Complete Examination Scope Worksheet with assistance from Compliance EIC and submit to ARD/FM for approval	

<b>No later than 45 days prior to exam</b>	<b>Initial When Completed</b>
Finalize and send PERK – Date sent:	
Input PERK Mail Date online:	
Ensure CRA PERK is included in the PERK, if applicable	
Contact CRA Specialist for preparation of fair lending summaries	
E-mail assisting examiners regarding assignments, travel issues, telecommuting options, and other logistical information	

<b>No later than one week before exam</b>	<b>Initial When Completed</b>
Finalize Scope Worksheet	
Review ILDR and LARs and create loan samples	
Contact CEO regarding exam logistics (start time, dress code, etc.) and to schedule initial meeting	
E-mail assisting examiners with any additional information obtained since initial e-mail	
Complete and submit Exam Supply Checklist	
Send prior exam work papers, supplies, etc. to exam site	
Review telecommute requests and forward to ARD/FM for approval	

### During the Examination

<b>First week of exam</b>	<b>Initial When Completed</b>
Input exam start date online and download the appropriate ROE shell	
Input PERK complete date online	
Provide phone number(s) to appropriate personnel	
Conduct initial meeting with CEO/senior management	
Establish ongoing meetings with management of savings association	
Establish ongoing updates with ARD/FM/Compliance EIC/CRA Specialist	
Discuss scope and assignments with assistants, including time for completion	
Ensure timely receipt and dissemination of PERK materials	
Distribute exam shells to appropriate examiners by including them in "working group"	

<b>Ongoing</b>	<b>Initial When Completed</b>
Coordinate schedules/timeframes	
Establish exit meeting and other meeting dates	
Coordinate interactions with association staff (control flow of memos and findings sheets)	
Provide written summaries of findings and issues to association management for its review and response, if necessary	
Adjust scope and exam procedures to address issues/findings/concerns and reallocate resources if warranted; discuss with ARD/FM	
Ensure all required Compliance programs are completed, including programs required for at least one examination cycle after a new or amended regulation goes into effect. Compliance minimums:	
• Compliance Management	
• Fair Lending	
• BSA/ OFAC/ USA PATRIOT Act	
• Flood	
Communicate with other agencies as warranted	
Monitor the following:	
• Telecommuting issues	
• Travel issues	
• WebTA/Leave issues	
Review work papers to ensure that conclusions and ratings are supported	
Prepare preliminary findings and conclusions	

## Appendix C: Examination Scheduling, Scoping, and Management

## Section 060

Draft ROE comments and edit comments prepared by assisting examiners. Verify completion of: Matters Requiring Board of Attention page Concentrations page	
Discuss findings, conclusions, and potential ratings with ARD/FM and obtain concurrence prior to exam exit meeting.	

<b>Last week of exam</b>	<b>Initial When Completed</b>
Prepare exam exit meeting agenda and conduct meeting	
Assemble OTS materials (work papers, reference materials, supplies) for shipment	
Return association materials	

<b>Post-examination</b>	<b>Initial When Completed</b>
Complete ROE and upload Field Final	
Input exam completion date online	
Input EDS information online (Ratings, Supplemental, Matters Requiring Board Attention, Reportable Data)	
Input Matters Requiring Board Attention online	
Issue ROE: Within 30 days – “1” or “2” composite ratings Within 45 days – “3,” “4,” or “5” composite ratings	
ROE Response Due Date (if required):	
ROE Response Reviewed (if applicable)	
Enforcement Review Committee (if applicable)	
Conduct the Board meeting	
Complete and discuss examiner assignment records with examiners and case FM/ ARD	
Complete and transmit work paper documentation	
– Upload/review remaining electronic work papers	
– Ensure indexes of hard copy work papers identify all electronic work papers	
– Send hard copy work papers to ARD/FM/record center	
– Lock electronic work papers	
Discuss ongoing role of EIC with ARD/FM, including possible role in ongoing monitoring of the association	
Prepare memo and update Scope Worksheet for inclusion in Administration File that sets forth information for the next exam, i.e., areas that should be reviewed next field visit or exam, new activities or management that were not in place during the full review period.	
Initiate PERK PAC for next exam	
Send an electronic copy of the updated Scope Worksheet to the FM/ARD for	

## Appendix C: Examination Scheduling, Scoping, and Management

### Section 060

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filing on the ECEF	
Complete the Comprehensive Exam Feedback Form	
Recommend postings to ECEF	
Discuss findings with financial analyst/ review examiner	
• Ensure Regulatory Profile is updated	
Trust Exams – complete Trust Regulatory Profile, if applicable	
Ensure Holding Company ROE and rating are finalized, if applicable	
Close out any outstanding issues with other agencies, if applicable	
Update Application Condition Monitoring Report, if applicable	
File this form in the Administration work papers	